

Vernette Walker
The News Journal
Ann Hines
Plaintiff
Defendants

FILED
NEWARK U.S. DISTRICT COURT
DISTRICT OF DELAWARE

2007 JUL 13 PM 3:06

06-138-MPT

July 13, 2007

Response To Defendant
Request to Produce

Documents I intend to rely upon in support of my complaint and charge are not readily accessible. I do intend to rely upon medical records, handbooks (co.), letters from Defendants & their counsel "Cynthia Hal Coffey", community legal aid (co.) DOOL letters and others as they become available to me. I also find concern in producing these documents because I see nothing relative to a good cause production of documents from me. Defendants Ann Hines / The News Journal should have documents to be produced as requested. I do authorize any documents you choose to request from any of the above names or companies be released to you.

Vernette Walker

Vernell Walker (Plaintiff) vs. The News Journal (Defendant)
Amr 4/1/05
In addition to original and final versions of documents, all drafts, alterations, modifications, changes and amendments of documents should be identified, as well as all copies non-identical to the original in any respect, including any copy bearing non-identical markings or notations of any kind.

5. If any information requested herein is withheld or redacted under claim of privilege or pursuant to any other legal doctrine, you are requested at the time of responding to these interrogatories to (i) state with specificity the claim of privilege or other reason used to withhold the information and (ii) identify all information by date and subject matter, without disclosing its contents, in a manner sufficient to allow it to be described to the Court for ruling on the privilege or other reason asserted. You are further requested to provide all requested information that is not subject to a claim of privilege or other reason for non-production by excising or otherwise protecting the portions for which a privilege is asserted, if such technique does not result in disclosing the contents of the portions for which some privilege is asserted.

6. If you object to any subpart of a request for information or object to providing certain information requested, state the objection and answer the unobjectionable subpart(s) of the request for information and/or supply the unobjectionable information requested.

These interrogatories are continuing in nature. If further information or documents come into your possession or are brought to your attention during preparation for trial, supplementation of your response is hereby requested.

INTERROGATORIES

1. Describe in specific detail each effort or action Plaintiff took to find employment following Plaintiff's separation from employment with The News Journal through the present (i.e., reviewing newspaper ads, contacting employment agencies, sending out resumes, etc.) and

Wilmington Transportation
The News Journal

(2)

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the frequency with which Plaintiff took such action(s) or made such effort(s) (i.e., daily, weekly, monthly, etc.).

2. Identify each employer or person from which Plaintiff received an interview and, if applicable, an offer of employment subsequent to Plaintiff's separation from employment with The News Journal through the present. *Wilm. Transportation - The News Journal*
NO interviews

3. Set forth in complete detail Plaintiff's employment history after Plaintiff's separation from employment with The News Journal, including the identity and address of each employer for whom Plaintiff worked and the dates for which Plaintiff worked for that employer(s).

4. Describe in complete detail the compensation (monetary and benefits) Plaintiff received from each employer for whom she worked after Plaintiff's separation from employment with The News Journal. *NOT ANY - The News Journal lost wages + permanent injury settlement*

5. If Plaintiff was self-employed at any time after Plaintiff's separation from employment with The News Journal, please identify all persons or companies for whom Plaintiff performed services, the services performed, and the income Plaintiff received for each venture.

6. After Plaintiff's separation from employment with The News Journal through the present, please identify the period(s) of time during which Plaintiff did not look for another job and explain the reasons behind such decision. *(see attached)*

7. Identify all health care providers, along with the address, which Plaintiff consulted with from January 2000 to the present and identify the specific issue or problem for which Plaintiff consulted each health care provider. *(see attached)*

8. Set forth in complete detail whether or not Plaintiff has been medically cleared to return to work. If so, when. By whom? *August 23, 2004 By Company Doctor (Linda Swick - Concentra Medical Center). Never received a return to work notice nor call from Defendant after August 23, 2004 (date of exam/evaluation)!*